

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

JONATHAN MANGAN, individually, and on  
behalf of all other persons similarly situated,

Plaintiffs,

vs.

CHRISTIAN COUNTY, MISSOURI, by and  
through its Board of County Commissioners, ROY  
MATTHEWS, TOM CHUDOMELKA, and  
BILL BARNETT, in their official capacities; and  
STEVE WHITNEY, Sheriff of Christian County, in  
his official capacity,

Defendants.

Case No. 99-3373-CV-S-AE-ECF

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

COMES NOW Plaintiff Jonathan Mangan ("Plaintiff"), on behalf of himself and all class members ("Plaintiffs"), and, pursuant to Fed. R. Civ. P. 54(d)(2) and 42 U.S.C. § 1988, submits the following Motion for Attorneys' Fees and Expenses. In support of this motion Plaintiffs state as follows:

1. On February 3, 2000, this Court entered an Order Approving Final Consent Decree, which found "Plaintiffs are a prevailing party and, therefore, are entitled to reasonable attorneys' fees and costs pursuant to U.S.C. § 1988."

2. Plaintiffs have incurred \$9,919.00 in attorneys' fees and \$607.26 in costs in the prosecution of this case. Plaintiffs also request \$720.00 for future monitoring of this case.

A Memorandum In Support of Motion for Attorneys' Fees and Expenses is being filed contemporaneously herewith.

WHEREFORE, Plaintiffs respectfully request this Court to award its attorneys' fees pursuant to 42 U.S.C. § 1988.

SHOOK, HARDY & BACON L.L.P.

By \_\_\_\_\_

Paul W. Rebein, MO # 43438  
Holly M. Pauling, MO # 51340

84 Corporate Woods  
10801 Mastin, Suite 1000  
Overland Park, Kansas 66610-1669  
913/451-6060  
FAX: 913/451-8879

ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17 day of February, 2000, I mailed, postage prepaid, a true and correct copy of the above and foregoing to:

Raymond E. Whiteaker, MO # 15574  
WHITEAKER & WILSON  
1919 East Battlefield, Suite B  
P.O. Box 3758  
Springfield, Missouri 65808-3758

ATTORNEY FOR DEFENDANTS

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Attorney for Plaintiff Jonathan Mangan

